

For the reporting period ending December 31, 2012

Annual Compliance Certification Report

Regulation 1138 – Section 17

Emission Standards for Area Source Prepared Feeds Manufacturing Facilities

[1]	Name of the facility:	Chiclets Mill and Feed Company	
[2]	Physical location – Street Address:	123 Michael Road	
	City, State, Zip Code :	New Castle, DE 19720	
[3]	Name of Owner or Operator:	H. David Sanders	
[4]	If <u>no deviations</u> occurred during the reporting period under 17.8.3 or 17.8.4 for new affected sources or 17.8.3 or 17.8.5 for existing affected sources <u>and</u> if the average daily feed production level (ADFPL) during the reporting period <u>did not exceed</u> 50 tons per day for the first time since the initial ADFPL was determined under 17.8.6, then . . . <ul style="list-style-type: none">• The owner or operator shall certify compliant operation throughout the reporting period by completing Item 5 no later than March 1 of the year following the reporting period. Items 6 through 10 of this report can be skipped.• The owner or operator shall prepare the “Annual Compliance Certification Report” no later than March 1 of the year following the reporting period. Submittal is not required. If <u>a deviation</u> occurred during the reporting period under 17.8.3, 17.8.4, or 17.8.5 <u>and/or</u> if the ADFPL during the reporting period <u>exceeded</u> 50 tons per day for the first time since the initial ADFPL was determined under 17.8.6, then . . . <ul style="list-style-type: none">• The owner or operator shall skip Item 5 of this report and resume completion of the “Annual Compliance Certification Report” beginning with Item 6.		
[5]	<ul style="list-style-type: none">• I certify that there were no deviations of any management practice and standard under 17.8.3 or deviations from proper operation under 17.8.4 or 17.8.5, as applicable, <u>and</u> the average daily feed production during the reporting period did not exceed 50 tons per day for the first time since the initial ADFPL was determined under 17.8.6.• I certify that all the statements and information contained in this report are true, accurate, and complete. <div>Signature: <input type="text"/></div> <div>Date : <input type="text"/></div> <div>Title/Position: <input type="text"/></div> <div>Telephone No: <input type="text"/></div> <div>Email Address: <input type="text"/></div> <div>Printed Name: <input type="text"/></div>		
[6]	If the average daily feed production level (ADFPL) for the reporting period <u>exceeded 50 tons per day for the first time</u> since the initial ADFPL was determined, the owner or operator shall provide the average daily feed production level for the reporting period in the space provided below. <div>Average daily feed production level for the reporting period: <input type="text"/> Tons per day</div>		
[7]	Indicate if any <u>deviations</u> occurred under 17.8.3, 17.8.4, or 17.8.5 during the reporting period. <div>Place “X” in the appropriate box Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></div> <ul style="list-style-type: none">• If the owner or operator placed the “X” in the No box (i.e. no deviations occurred), the owner or operator shall certify this report by completing Item 8 and shall submit this report to the agencies in Item 11 no later than March 1 of the year following the reporting period. Items 9 and 10 of this report can be skipped.• If the owner or operator placed the “X” in the Yes box (i.e. a deviation occurred), the owner or operator shall skip Item 8 and resume completion of the “Annual Compliance Certification Report” beginning with Item 9 on page 2.		
[8]	<ul style="list-style-type: none">• I certify that there were no deviations of any management practice and standard under 17.8.3 or deviations from proper operation under 17.8.4 or 17.8.5, as applicable.• I certify that all the statements and information contained in this report are true, accurate, and complete. <div>Signature: <input type="text"/></div> <div>Date : <input type="text"/></div> <div>Title/Position: <input type="text"/></div> <div>Telephone No: <input type="text"/></div> <div>Email Address: <input type="text"/></div> <div>Printed Name: <input type="text"/></div>		

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- [9] List all deviations that occurred under 17.8.3, 17.8.4, and 17.8.5 of Section 17 during the reporting period. Identify the affected source, provide the beginning and end dates of each deviation, and provide a brief description of the deviation and the corrective actions taken.

If additional entries are required, continue on the additional sheet (provided) and attach to this report.

<u>Affected source</u>	<u>Deviation Start Date</u>	<u>Deviation End Date</u>
Cyclone (CY-2)	September 30, 2012	October 15, 2012

Description of Deviation

On Oct. 14, the facility realized the third quarter inspection (scheduled for Sept. 15, 2012) of cyclone (CY-2) had not been conducted because the maintenance scheduler had been on medical leave at the time.

Corrective Actions Taken

On Oct. 14, maintenance scheduled a shutdown of the animal feed line for inspection of CY-2 on the following day. The inspection was completed. In addition, the facility revised the maintenance scheduling program to automatically generate a report to the maintenance supervisor prior to future scheduled inspections as well as generating a report for monthly major cleaning.

<u>Affected source</u>	<u>Deviation Start Date</u>	<u>Deviation End Date</u>
Cyclone (CY-2)	October 23, 2012	October 24, 2012

Description of Deviation

During the Oct. 23 daily monitoring of the cyclone pressure drop, the operator found that the pressure drop of CY-2 had fallen below the lower established proper operating value of 10 inches WC.

Corrective Actions Taken

The drop in pressure drop was a result of the failure of the flexible connector between the outlet of the cyclone and ducting on the fan side; internal abrasion was the cause of the failure. Maintenance staff affected a temporary repair at the time and a replacement of the flexible connection was installed on CY-2 on Oct. 24. Alternative flexible connectors are being considered.

<u>Affected source</u>	<u>Deviation Start Date</u>	<u>Deviation End Date</u>
Cyclone (CY-2)	December 10, 2012	December 15, 2012

Description of Deviation

On Dec. 13, the mill manager identified a noticeable amount of finished product on the ground near the railcar loading station. Further investigation indicated there was a leaking flange in the overhead transfer line. The leak was initially reported on Dec. 10.

Corrective Actions Taken

The cause of the leak was a blown gasket. Maintenance staff affected a temporary seal of the flange at the time and replaced the gasket on Dec. 15. Management met with operating and maintenance personnel to emphasize the need for improved communications and action when operating problems occur to reduce personnel exposure, pollution emissions, and loss of the mill's products.

- [10] I certify that all the statements and information contained in this notification are true, accurate, and complete.

Signature: H. David Sanders

Date: February 14, 2013

Title/Position: Plant Manager

Telephone No: 302.555.9984

Email Address: HDSANDERS@CHICLETS.COM

Printed Name: H. David Sanders

- [11] If the owner or operator is required to submit this "Annual Compliance Certification Report", the report must be submitted to the following agencies by March 1 of the year following the reporting period. **Remember** to keep a copy of this notification.

Delaware Department of Natural Resources
and Environmental Control
Director, Division of Air Quality
Blue Hen Corporate Center
655 S. Bay Road, Suite 5N
Dover, DE 19901

U. S. Environmental Protection Agency
Director, Air Protection Division
1650 Arch Street
Philadelphia, PA 19103